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**REMARKS**

Applicant wishes to thank the Examiner for reviewing the present application and the response. The Examiner has rejected the claims presently on file under 35 USC 102 in view of the prior art reference Biancheri. The applicant has amended the claims on file to further distinguish over the Biancheri reference and more clearly define the scope of protection sought. The applicant has also amended claims 1, 3 and 5 to overcome the Examiner's objections to these claims based on formalities.

The prior art reference Biancheri describes a three-tier application. It has a database for organizing internet and other resources. There is a middle-ware layer for interfacing the database with a user layer. It also has a user/client layer that provides services for receiving queries from and providing data to a browser or mobile phone user. In this sense, the user/client layer is not an application in that no logic processing is provided. Merely the submission of a question and the formatting of the query result are provided.

Although a middle-ware layer is disclosed, the system as described in Biancheri maintains its database and middle-ware layers separately from its user/client layer. In other words, the prior art system discloses the generation of only a user/client tier from an abstract notation file. It does not disclose generating an entire multi-tier application, nor that the application has a predetermined combination of components selected from each tier.

By contrast the present application is directed to the generation of an entire multi-tier application from a single abstract notation description file. The application is described in an abstract notation as contained in the description file. The description defines a predetermined combination of components to be deployed at different tiers. The application generator converts the description file into a number of platform-specific output files, based on input parameters entered. Each output file corresponds to a component selected for deployment on a specific platform for a particular tier. The deployment of the application generated from the single description file facilitates the communication of data between components deployed on

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neighboring tiers. This is entirely different from the Biancheri reference where only a user/client tier is generated from an abstract notation file for interfacing with the rest of the system, which is maintained and developed independent of the abstract notation file.

Claim 1 has been amended to draw out this distinction further by defining more clearly a system for generating a multi-tier application consisting of a plurality of sub-applications, the multi-tier application being generated entirely from an abstract notation description file. Biancheri does not teach the generation of an entire multi-tier application from a single abstract notation description file; it teaches only the generating of a user tier for interfacing with an existing system. Further, claim 1, as amended, requires that a predetermined combination of components of the multi-tier application be defined by an abstract notation description. As Biancheri is focused on generating a suitable user tier for the type of user device detected, there is no teaching in Biancheri to use such an abstract notation description for the entire system, let alone to use it to define such a predetermined combination. The applicant also notes that the amended claim 1 clearly requires that the application generator cited transform the abstract notation description to multiple platform notations for each of the components deployed on different tiers. Bianchi teaches a transformation for only one particular tier, namely the user tier, not all tiers of the multi-tier application. Therefore, Biancheri at least does not disclose or teach the above-noted limitations required in claim 1. Accordingly, it is respectfully submitted that Biancheri does not anticipate claim 1 under 35 USC 102 and claim 1 clearly and patentably distinguish over Biancheri.

Corresponding language can be found in the amended independent claims 4, 5 and 6. For the same reasons above, it is submitted that claims 4, 5 and 6 are also not anticipated by Biancheri and that claims 4, 5 and 6 also clearly and patentably distinguish over Biancheri.

Claims 2 and 3, depending from claim 1, are amended in light of the amendments to claim 1. Claim 7 is new and depends from claim 1. In as much as claim 1 is patentable over Biancheri, it is respectfully submitted that claims 2, 3 and 7 are also patentable over Biancheri.

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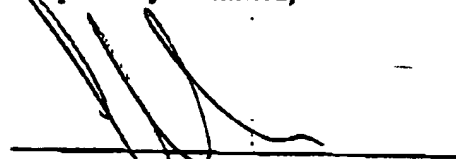
Claim 1 has been amended to remove the word "utilisation" objected to by the Examiner. Claim 5 has been amended to delete the extra "the" noted by the Examiner. Claim 1 has also been amended to replace "application file" with "description file" to provide proper antecedent basis for the term.

No new subject matter is introduced by way of these amendments.

\* \* \*

In light of the claim amendments and the foregoing remarks, it is believed that the pending claims all clearly and patentably distinguish over the reference applied and are in condition for allowance. Applicant requests early reconsideration and allowance of the present application.

Respectfully submitted,



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JRO/szh